

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

RW DBA RHM,

Plaintiff,

V.

## The Partnerships, and Unincorporated Associations Identified in Schedule A,

Defendants.

Case No. 1:24-cv-01289

Honorable Judge John Robert Blakey

**DEFENDANTS' UNOPPOSED MOTION TO EXTEND DEADLINE  
TO ANSWER OR OTHERWISE RESPOND**

Defendants Shanxiyouyijing, ShangHaiOuLi, Liu Junhao, ShanXiRuiKeHe, DMSUS, Chen JiaLe, Liu Zhipeng, Zhang Chunxiang, Pulunto, WEIXinxin, YONGQI, Amyhi, YES.YM, BETTER LIFE, BrightBuy.HOME, kiwi4fruit, Kunjiadaren, Manhuayuanmu, Jerryrenjie, Celinlkeoder, Sweetteam, Mystic, Tamia, and SXhyf Store (collectively “Defendants”) respectfully move this Court for an extension of time, up to and including April 11, 2024, for Defendants to answer or otherwise respond in this matter. In support thereof, Defendants state as follows:

1. The current deadline for Defendants to answer or otherwise respond in this matter is March 21, 2024. Dkt. No. 21.

2. Plaintiff and Defendants have been conducting a good faith settlement negotiation and additional time is needed for Defendant to investigate and prepare a proper response to the Complaint.

3. Defendants request an extension of time until April 11, 2024, to answer, or otherwise respond to the complaint in this matter.

4. Plaintiff has consented to this extension of time.

5. This is Defendants' first extension of time request. This motion is brought in good faith and will not cause prejudice to the parties.

WHEREFORE, Defendants respectfully request this Court grants this unopposed motion and extend the deadline by which Defendants is to answer, or otherwise respond to, the complaint in this matter, up to and including April 11, 2024.

Dated: March 20, 2024

Respectfully submitted,

/s/ Timothy T. Wang

Timothy T. Wang

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**ATTORNEY FOR DEFENDANTS**

### **CERTIFICATE OF SERVICE**

On March 20, 2024, I filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the CM/ECF System which will send notification of said filing to all counsel of record.

/s/ Timothy T. Wang

Timothy T. Wang